

#### MARYLAND HEALTH BENEFIT EXCHANGE

# **Exchange Billing and Collections Recommendation**

June 8, 2012

# Recap: Individual Exchange Billing and Collections Options

ACA specifies that individual billing and collections is optional for the Individual Exchange but required for SHOP

Exchange staff evaluated three approaches:

- 1. Exchange performs all individual billing and collections
- 2. Exchange performs initial billing only
- 3. Carriers perform initial and ongoing billing and collections

# Strategic Considerations: Role of the Exchange in the Marketplace

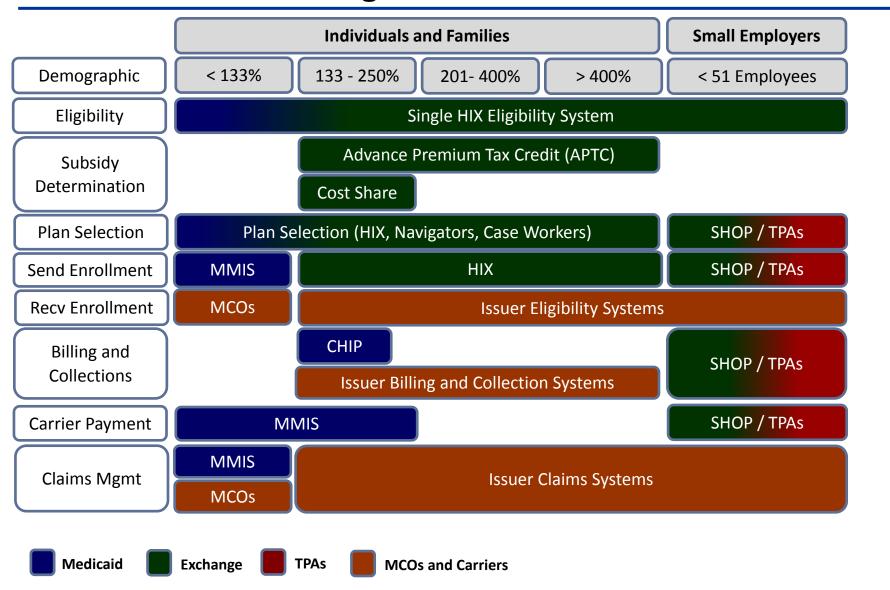
### **Customer Experience Perspective**

- "Trusted" provider of information and education about Health Coverage Options
- Access point to financial assistance for health coverage (e.g. Medicaid, CHIP, APTC, Cost Share subsidies)
- World class online retail site for purchasing health coverage
- Ongoing guide and resource for managing health care coverage during transitional life changes (dealing with churn and continuity of coverage)
- Agent for driving down Insurance costs through transparency and possibly "active purchasing" in the future
- Provider of superior customer service

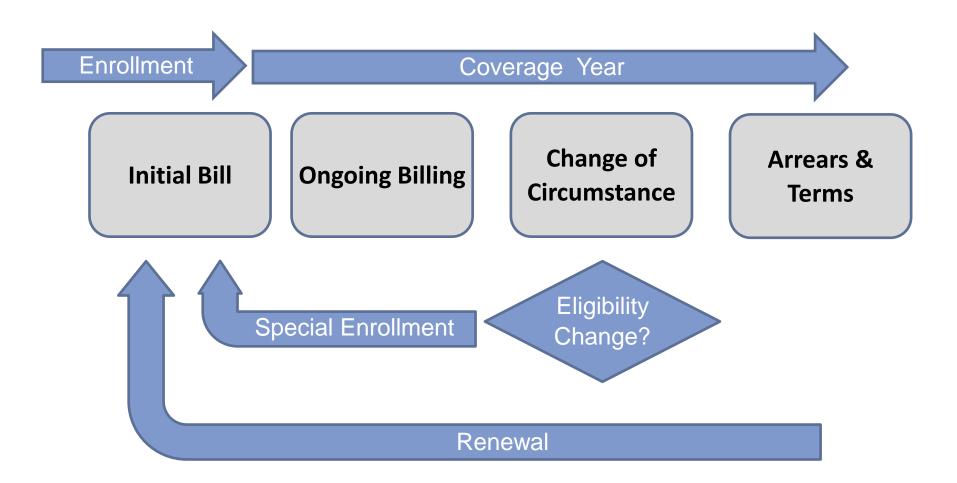
### **Organizational Objectives**

- CMS certified and fully operational by 2013
- Efficient Operations
- Effective Oversight

# Medicaid and Exchange Customer Value Chain where Carriers Perform Billing and Collections



# **High Level Billing and Collections Life-Cycle**



# **Billing and Collection Workflows**

All options result in risks that need to be mitigated through technology or process throughout the billing and collections life-cycle

#### **Initial Billing**

- How does the customer complete an enrollment if billing is a workflow step not handled within the HIX
- What if multiple forms of coverage (e.g. Commercial, CHIP, Dental) are selected?

#### **Ongoing Billing**

How do the Exchange and carriers keep billing and collections data in synch?

#### **Changes of Circumstance**

- How are customers guided back to the Exchange for subsidy redetermination?
- What is the timing and process for exchanging CoC and billing changes between the HIX and carriers?

#### **Arrears, Grace Periods, and Terminations**

- How are arrears and terminations communicated between the HIX and carriers?
- How do we support consumers who can only afford partial payments or who are facing termination for non-payment (should they be redetermined for greater subsidy or Medicaid?)
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## **Exchange Performs Individual Billing and Collections**

### **Advantages**

- Better customer online retail experience
- Capability is required for the SHOP so the incremental establishment cost will be low
- The Exchange will have an ongoing relationship with customers allowing more frequent communications, and better ability to support eligibility changes
- Billing and collections to consumers will be consistent regardless of which plan they choose or how many plans they have (e.g. ATPC and CHIP)
- Carriers are not required to have their own billing system supports new entrants to market
- Reduces oversight and integration points with carriers

## **Exchange Performs Individual Billing and Collections**

## Disadvantages

- The risk of adding another significant function to everything else that needs to be delivered by 2014 may jeopardize other required ACA functions
- Increased operational complexity and expense for the Exchange
- Risk of ineffective billing by the Exchange will have negative carrier and customer consequences

## **Carriers Perform Individual Billing and Collections**

### **Advantages**

- Lower operational complexity and expense for the Exchange
- The risk of adding another significant function to everything else that needs to be delivered by 2014 may jeopardize other required ACA functions
- Most carriers are proficient in individual billing and collections and want to retain that function
- Risk of ineffective billing by the Exchange will have negative carrier and customer consequences

## **Carriers Perform Individual Billing and Collections**

## Disadvantages

- Fragmented and inconsistent online retail experience
- Significant investment for interfaces between the Exchange and carriers to mitigate customer experience issues and to provide effective oversight and monitoring
- More complex business agreements and certification requirements for carriers may discourage smaller companies and new entrants from participating in the Exchange

## **Recommendation Summary: Further Analysis!**

The Exchange staff is not persuaded that any option is superior as there are still gaps in our knowledge with respect to customer and operational impacts

#### Recommend the following steps:

- 1. Due to synergy with group billing and low incremental cost, the Exchange proceeds with technology development of individual billing and collections
- 2. Hire a consultant to make a recommendation by October on whether to "operationalize" the billing and collection function. Specifically,
  - Determine impacts on customers and overall market for the different billing and collections options
  - Determine impacts on Exchange establishment and ongoing operations for the Exchange
  - Specify resource requirements, operational budget, and integration requirements with carriers for each option
  - Determine impact of option to delay Exchange billing until 2015
- 3. Implement Board-approved operational approach starting in Q4

## Implementation Paths post Board October Decision

#### **If Exchange performing Billing and Collections**

- Technology for individual billing and collections will already be in progress
- Incorporate operational resources for individual billing into the overall Call Center operations contract (already will have billing unit for SHOP)
- Coordinate integration testing with carriers

#### If Exchange defers Billing and Collections to Carriers

- Modify issuer agreements to incorporate billing and collections technology integration requirements, data and reporting requirements, and performance metrics and service level agreements
- Modify HIX to integrate with issuer systems for required data exchanges
- Coordinate integration testing with carriers
- Implement policies and procedures for oversight